

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Case No. 20-20364-JAD
)	
TASHA M. MCKENZIE AKA TASHA)	Chapter 13
MARIE MCKENZIE-HAYES)	
Debtor.)	Docket No.
)	
PNC BANK, NATIONAL ASSOCIATION)	
Movant)	
)	
v.)	
)	
TASHA M. MCKENZIE AKA TASHA)	
M. MCKENZIE-HAYES,)	
Respondent)	

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW come the Debtor, Tasha M. McKenzie, by and through her Attorney, Albert G. Reese, Jr., and files the following Response to Motion for Relief from Automatic Stay:

1. The averments contained in paragraph one are admitted.
2. The averments contained in paragraph two are admitted.
3. The averments contained in paragraph three are admitted.
4. The averments contained in paragraph four are admitted. By way of further answer, the Debtor needs her home for the success of her Chapter 13 Plan. In addition, Debtor was directly affected by the COVID-19 pandemic in that she lost wages. As a result, Counsel filed an amended Chapter 13 plan to cure all plan arrears and the Debtor will begin making plan payments.
5. The averments contained in paragraph five are admitted.
6. The averments contained in paragraph six are denied. By way of further answer, the Debtor needs her home for the success of her Chapter 13 Plan. In addition, Debtor was directly affected by the COVID-19 pandemic in that she lost wages.

As a result, Counsel filed an amended Chapter 13 plan to cure all plan arrears and the Debtor will begin making plan payments.

7. The averments contained in paragraph seven are denied. By way of further answer, the Debtor needs her home for the success of her Chapter 13 Plan. In addition, Debtor was directly affected by the COVID-19 pandemic in that she lost wages. As a result, Counsel filed an amended Chapter 13 plan to cure all plan arrears and the Debtor will begin making plan payments.
8. The averments contained in paragraph eight are denied. By way of further answer, the amended Chapter 13 Plan cures the arrears.
9. The averments contained in paragraph nine are admitted.
10. The averments contained in paragraph ten are admitted.
11. The averments contained in paragraph eleven are admitted.
12. The averments contained in paragraph twelve are admitted.
13. The averments contained in paragraph thirteen are admitted.
14. The averments contained in paragraph fourteen are denied. By way of further answer, the Debtor needs her home for the success of her Chapter 13 Plan. In addition, Debtor was directly affected by the COVID-19 pandemic in that she lost wages. As a result, Counsel filed an amended Chapter 13 plan to cure all plan arrears and the Debtor will begin making plan payments.
15. The averments contained in paragraph eight are denied. By way of further answer, the amended Chapter 13 Plan cures the arrears.
16. The averments contained in paragraph fifteen are denied. By way of further answer, the Debtor needs her home for the success of her Chapter 13 Plan. In

addition, Debtor was directly affected by the COVID-19 pandemic in that she lost wages. As a result, Counsel filed an amended Chapter 13 plan to cure all plan arrears and the Debtor will begin making plan payments.

17. The averments contained in paragraph eight are denied. By way of further answer, the amended Chapter 13 Plan cures the arrears.

WHEREFORE, the Debtor prays that this Honorable Court deny the Motion for Relief from Automatic Stay.

Dated: **August 3, 2020**

Respectfully submitted by:
/s/ Albert G. Reese, Jr., Esq.
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